

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAMES T. SULLIVAN, etc., et al.,)	
)	
Plaintiffs,)	No. 06 C 2464
)	
v.)	Judge David H. Coar
)	
GENERAL PLUMBING, INC.,)	Magistrate Judge
an Illinois corporation,)	Maria Valdez
Defendant.)	

MOTION FOR ENTRY OF SUPPLEMENTAL JUDGMENT

NOW COME Plaintiffs, JAMES T. SULLIVAN, etc., et al., by their attorneys,
DOUGLAS A. LINDSAY, JOHN W. LOSEMAN, LISA M. SIMIONI, and BRIAN T.
BEDINGHAUS, with LEWIS, OVERBECK & FURMAN, LLP, of counsel, and, pursuant to the
Order entered September 19, 2007, moves the Court to enter a Supplemental Judgment in favor
of Plaintiffs and against Defendant, GENERAL PLUMBING, INC., in the amount of \$19,162.12.
In support hereof, Plaintiffs state:

1. On June 16, 2006, this Court entered a default judgment against the Defendant in the amount of \$163,486.90.
2. On March 31, 2007, this Court denied the Defendant's Motion to Vacate.
3. On September 19, 2007, this Court granted Plaintiffs' Petition for Supplemental Judgment for Attorneys' Fees and Costs. *Order of September 19, 2007, Doc. No. 47.*
4. The September 19, 2007, order granting Plaintiffs' petition for supplemental judgment does not state a liquidated amount to be awarded, and a corresponding judgment order

has not been entered as a separate document.

5. Plaintiffs' petition requested attorneys' fees and costs in the amount of \$19,162.12. *Plaintiff's Petition for Supplemental Judgment*, p. 4, Doc. 41.

6. A draft Supplemental Judgment Order is attached hereto as Exhibit A.

WHEREFORE, Plaintiffs, JAMES T. SULLIVAN, etc., et al., request the Court to enter a Supplemental Judgment in favor of Plaintiffs and against Defendant, GENERAL PLUMBING, INC., in the amount of \$19,162.12, and to award such other and further relief in favor of Plaintiffs and against Defendant as the Court deems just.

JAMES T. SULLIVAN, etc., et al., by their
attorneys, DOUGLAS A. LINDSAY, JOHN W.
LOSEMAN, LISA M. SIMIONI, and BRIAN T.
BEDINGHAUS

By: s/ Brian Bedinghaus

Brian T. Bedinghaus
20 North Clark Street
Suite 3200
Chicago, IL 60602-5093
312.580.1269

Of Counsel:
LEWIS, OVERBECK & FURMAN, LLP
20 North Clark Street
Suite 3200
Chicago, IL 60602-5093
312.580.1200

CERTIFICATE OF SERVICE

Brian T. Bedinghaus hereby certifies that service of the foregoing MOTION FOR ENTRY OF SUPPLEMENTAL JUDGMENT was effected upon the following person(s):

Ronald J. Kramer, Esq.
Colin M. Connor, Esq.
Seyfarth Shaw LLP
131 S. Dearborn Street
Suite 2400
Chicago, IL 60603-5577
rkramer@seyfarth.com
cconnor@seyfarth.com

through the CM/ECF system of the United States District Court for the Northern District of Illinois as a result of electronic filing made on this 25th day of January, 2008.

s/ Brian T. Bedinghaus

Brian T. Bedinghaus
20 North Clark Street
Suite 3200
Chicago, Illinois 60602-5093